



DEFENSE ENERGY SUPPORT CENTER

Oil Spill Response

Facility Response Plans





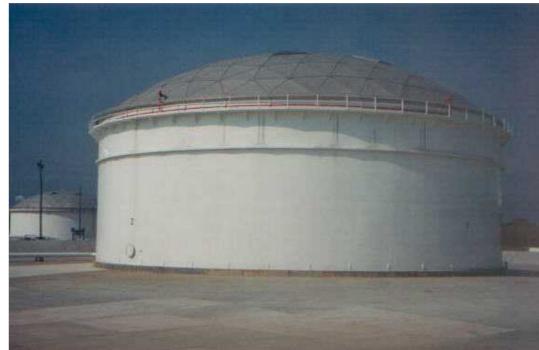
Purpose of a Facility Response Plan



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- Describes facility actions if a SPCC plan fails
 - Notifications
 - Incident Command System
 - Detailed response scenarios
 - Detailed drawings

DEFENSE FUEL SUPPORT POINT CHARLESTON HANAHAN, SOUTH CAROLINA FACILITY RESPONSE PLAN



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Regulatory Requirements for a Facility Response Plan



- Not all facilities with an SPCC plan require a detailed FRP
- Non-Transportation Related (NTR) OPA 90 regulations of possible concern – 40 CFR 112
- If regulation criteria do not apply, a simplified response plan is still required - 40 CFR 112.7(a)(4) & (5)
- Personnel at a facility with an SPCC plan required to meet training requirements found in 40 CFR 112.7(f)





Regulatory Requirements for a Facility Response Plan – EPA NTR Substantial Harm Criteria



- Storage capacity \geq 1 million gallons & meets one of the following criteria in 40 CFR 112.20:
 - Secondary containment for each AST area is large enough to contain capacity of largest AST + precipitation freeboard
 - Discharge from the facility could cause harm to fish, wildlife & sensitive environments
 - Discharge from facility would shut down a public drinking water intake
 - Reportable discharge \geq 10K gallons in last 5 years





Regulatory Requirements for a Facility Response Plan -

EPA NTR Substantial Harm Criteria



- Storage capacity \geq 42K gallons & transfers oil over water
 - Example – Recreational marina that fuels vessels with \geq 42K gallons of storage





Regulatory Requirements for a Facility Response Plan -

EPA NTR Special Circumstances



- EPA Regional Administrator (RA) may require FRP based on consideration of the following:
 - Type of transfer operation
 - Oil storage capacity
 - Lack of secondary containment
 - Proximity of fish, wildlife and sensitive areas
 - Proximity of drinking water wells
 - Spill History
 - Other site-specific characteristics & environmental factors





Regulatory Requirements for a Facility Response Plan - EPA NTR Criteria



- Facilities that do not meet substantial harm criteria must:
 - Complete and maintain on file the certification found in Attachment C-II to Appendix C of 40 CFR 112
 - Certification must state that facility does not meet Substantial Harm Criteria
 - Failure to maintain certification will get attention of EPA inspectors





Contents of a Useful Facility Response Plan



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Emergency Response Action Plan

- Red plan
- Notification list
- Briefing & tracking forms
- Response action plans
- Response personnel
- Equipment list
- Sensitive areas
- Disposal plan
- Evacuation plan
- Maps
- Public affairs plan
- Health & safety plan
- Security & communications

Facility Response Plan

- Facility Information
- Notification, personnel & equipment lists
- Hazard evaluation
- Scenarios
- Discharge detection systems
- Response resources
- Drills & Exercise procedures
- Communication
- MSDSs
- Natural Resource Damage Assessment (NRDA)
- Definitions, Acronyms, References



Exercising Your Facility Response Plan – 3-Year Training Cycle



- 12 Qualified Individual (QI) notification drills (1 per quarter)
- 3 Spill Management Team tabletop exercises - one involves a worst-case discharge scenario (1 per year)
- 3 unannounced exercises (1 per year)
 - Any exercise, with exception of QI Notification Drill, if conducted unannounced, will satisfy this requirement
 - 1 unannounced exercise must be an Equipment Deployment Exercise
 - A spill response will satisfy this requirement





Exercising Your Facility Response Plan



- 3-year training cycle (continued)
 - 6 facility-owned Equipment Deployment Exercises (for facilities with facility-owned equipment identified in their response plan) per year)
 - 3 Oil Spill Response Organization (OSRO) Equipment Deployment Exercises (spill response organizations must satisfy this requirement)





Exercising Your Facility Response Plan - Core Test Components of a Response Plan



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Organizational Design	Operational Response	Response Support
Notifications	Discharge control	Communications
Staff Mobilization	Assessment of discharge	Transportation
Response Management System	Containment of discharge	Personnel Support
	Recovery of spilled material	Equipment maintenance & support
	Protection of sensitive areas	Procurement
	Disposal of recovered products	Documentation



Response Management System -

The Role of the Emergency Coordinator



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- Qualified Individual (QI) has authority to:
 - Activate/contract w/OSROs
 - Act as liaison w/FOSC
 - Obligate funds to carry-out response activities

EPA OPA 90 regulations allow QI & IC responsibilities to be done by separate individuals.

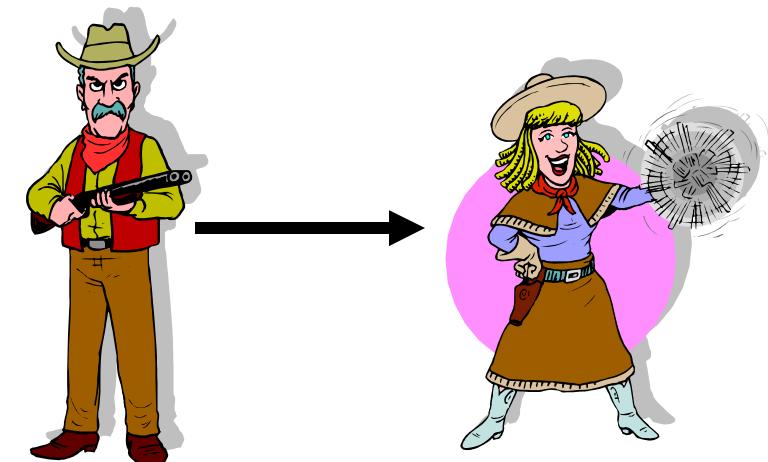
- Incident Commander (IC) responsibilities include:
 - Implementing FRP
 - Developing strategic objectives/response priorities
 - Approving incident action plans and other plans
 - Attend Unified Command meetings w/FOSC and regulators



Response Management System -

The Importance of a Trained Emergency Coordinator

- What does trained mean?
 - Familiarity with contents of FRP
 - Participation in Table Top Exercises and Drills
- Why is it important?
 - Regulators watching performance during a spill
 - Knowledge of resources
 - Knowledge of personnel





Reporting Spills to DESC



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- Initial Report
 - Date of spill event
 - Location
 - Type of fuel released
 - Amount of fuel released
 - Cause of release
 - Was release contained
 - Amount of fuel recovered
 - Impact to navigable waters
- Follow-on Report
 - Cause of fuel release
 - Status of repairs if required
 - Need for a site assessment
 - Need for further remediation
 - Impact to groundwater

Email spill reports to:
desc.spillreports@dla.mil



DESC vice Military Service Responsibilities



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- DESC provides funding for:
 - Development and update of SPCC plans and FRPs for facilities with DESC capitalized product
 - Cleanup of releases of DESC capitalized product
 - Repair/mai

facilities





DESC vice Military Service Responsibilities



- Military Services responsible for:
 - Implementing repair/maintenance of storage facilities
 - Maintaining up-to-date SPCC plans and FRPs
 - Exercising the Response Plan with trained personnel





DESC Funding - OPA 90 Tabletop Exercises?



- Currently DESC not allowed to fund OPA 90 exercises
- DOD Directive 5101.8 – Executive Agent for Bulk Petroleum – may lead to changes
- Until then, funding is responsibility of military services



Panel Discussion

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